



GORHAM TELEPHONE COMPANY

February 2, 2006

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Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

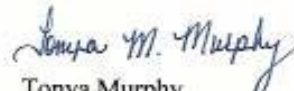
Re: Certification of CPNI Filing (February 2, 2006)
Docket No. EB-06-TC-060

Dear Ms. Dortch:

In compliance with the FCC's Public Notice, DA 06-223 (released on January 30, 2006), Gorham Telephone Company hereby files its report providing its annual CPNI officer certification and accompanying statement explaining how its operating procedures ensure compliance with the FCC's CPNI rules.

Should you have any questions or need additional information, please contact the undersigned.

Sincerely,


Tonya Murphy
Secretary / Treasurer

cc: Mr. Byron McCoy (FCC)
Best Copy and Printing, Inc.

ANNUAL CERTIFICATE OF COMPLIANCE
WITH CPNI REGULATIONS

I, Tonya Murphy, an officer of Gorham Telephone Company (hereinafter "the Company"), do hereby certify based upon my personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in 47 C.F.R. §§ 64.2001-64.2009. The statement accompanying this certificate explains how the Company's operating procedures ensure that it is in compliance with those rules.

Officer's signature: Tonya M. Murphy

Date: 1/2/06

CPNI Operating Procedures

1. Every employee of Gorham Telephone Company (the “Company”) has a duty to protect the confidentiality of customer proprietary information (“CPNI”), as defined in 47 U.S.C. 222(F). A violation of the Company’s operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee’s record. An employee will be subject to termination of employment for a second violation.
2. The service categories provided by the company include local exchange telephone service and long distance telephone service. It is the Company’s policy to not use CPNI for any sales or marketing purpose unless permission from the customer has been granted. Specifically, use of CPNI obtained from the Company’s provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.
3. The Company will use the “Opt-In” CPNI approval method.
 - The Company waits 30 days (minimum) after giving customers notice and an opportunity to opt-in before assuming customer approval to use, disclose, or permit access to CPNI. No notification to the Company meant they opted out. On new installs the company requests permission at that time.
 - The Company will check the box in Customer Master indicating the customers who have chosen the opt-in method, allowing use of CPNI. If the box in Customer Master is NOT checked, this will indicate that the customer has NOT chosen to have their CPNI information shared with the company or any of its subsidiaries and no marketing can be done without their further approval.
4. No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes.
 - to bill or collect payment for the Company’s services or

- to protect the rights or property of the Company or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any marketing purpose.
- 5. A Company employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Company.
- 6. The Company customer service representatives may use oral notice for those who have NOT chosen to have their CPNI information shared on a one-time basis for both inbound and outbound customer telephone contacts for the duration of the call. The customer must be asked if they consent to have their CPNI shared only during this call. If the customer gives verbal approval, then the CS representative may use the CPNI information to market products not currently used by this customer. The CS representative must input into the comment section of Customer Master, the customer CONSENTS to the use of their CPNI.
- 7. Any use of individually identifiable CPNI to market services related to those which the customer already subscribes does NOT require notice, opt-in or consent. However, to use CPNI to market an unrelated communication service, there must be adequate notice given through the opt-in procedure, OR the CS representative must obtain a one-time approval from the customer to use the CPNI.
- 8. Any marketing promotion which is promoted to the population as a whole does NOT apply to CPNI rules (no advance notice, ability to opt-in or express consent is required) because we are not using individually identifiable customer information.
- 9. Any marketing promotion to ALL customers living on a particular street or area does NOT require notice and/or consent because addresses are not considered CPNI.

10. The Company will provide the FCC written notice within five business days of any instance where the opt-in mechanism did not work properly, to such a degree that customers' inability to opt-in is more than an anomaly.
11. The customer service will review the process for CPNI with each customer service representative on a yearly basis and it will be documented.
12. An Officer of the Company will sign a compliance certificate on an annual basis stating that the company has established operating procedures that are adequate to insure compliance. An accompanying statement must explain how its operating procedures ensure that it is, or is not, in compliance with the rules.
13. The Company keeps a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI (hereinafter referred to as "the CPNI record"). An employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reasons for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the company for a minimum period of one year.
14. Should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Company has sent customers the notices required by 47 C.F.R. 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. Sales personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Company will establish a system by which the status of a customer's CPNI in an out-bound sales or marketing campaign. Upon such a change in Company policy, employees must add to the CPNI record a description of each such out-bound marketing campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.